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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANDREEA POP, Individually,

Plaintiff,

V.

UNITED STATES; U.S. DEPARTMENT OF HOMELAND SECURITY; TRANSPORTATION SECURITY ADMINISTRATION; DOES I through X; and ROE CORPORATIONS I through X, inclusive,

Defendants.

Case No. 2:23-cv-01301-RFB-BNW

Stipulation and Order to Extend Discovery Deadlines

(Second Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a thirty (30) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This stipulation is filed at least 21 days before the earliest deadline to be extended (close of discovery). The current deadline for close of discovery is December 10, 2024. The parties have conducted discovery diligently and in good faith. However, unforeseen circumstances that are out of the parties' control necessitate the request for this extension. This is the second request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Defendant made its initial disclosures on March 7, 2024.

1 2. Plaintiff made her initial disclosures on March 7, 2024.

2 3. Plaintiff served her first set of requests for production, and first set of
3 interrogatories on Defendant on March 19, 2024.

4 4. Defendant served its responses to Plaintiff's first set of requests for
5 production, and first set of interrogatories on April 18, 2024.

6 5. Plaintiff served her first set of requests for admission, second set of requests
7 for production, and second set of interrogatories on Defendant on April 19, 2024.

8 6. Defendant served its responses to Plaintiff's first set of requests for
9 admission, second set of requests for production, and second set of interrogatories on May
10 20, 2024.

11 7. Defendant requested and Plaintiff provided HIPAA authorizations to allow
12 Defendant to obtain Plaintiff's pertinent medical records.

13 8. Plaintiff served her first supplement to initial disclosures of witnesses and
14 documents on May 6, 2024.

15 9. Defendant served it first supplement to initial disclosures of witnesses and
16 documents on May 20, 2024.

17 10. Defendant served its second supplement to initial disclosures of witnesses and
18 documents on May 23, 2024.

19 11. Plaintiff served her second supplement to initial disclosures of witnesses and
20 documents on May 23, 2024.

21 12. Defendant served its first set of requests for admission, first set of
22 interrogatories and first set of requests for production on Plaintiff on May 30, 2024.

23 13. Defendant took Plaintiff's deposition on June 4, 2024.

24 14. Plaintiff served her third supplement to initial disclosures of witnesses and
25 documents on June 5, 2024.

26 15. Plaintiff took the depositions of TSA agents Bevan and Harris on June 18,
27 2024.

28 16. Plaintiff served her third set of interrogatories on Defendant on June 20, 2024.

1 17. Plaintiff served her fourth supplement to initial disclosures of witnesses and
2 documents on July 3, 2024.

3 18. Plaintiff served her responses to Defendant's first sets of interrogatories,
4 requests for admission and requests for production, on July 3, 2024.

5 19. Defendant served its responses to Plaintiff's third set of interrogatories on July
6 8, 2024.

7 20. Defendant served its third supplement to initial disclosures of witnesses and
8 documents on August 2, 2024.

9 21. Plaintiff took the depositions of TSA agents Nguyen and Maglalang on
10 August 8, 2024.

11 22. Defendant took the deposition of TSA's Program Analyst, Eric Kruger on
12 September 19, 2024.

13 23. Plaintiff served its initial expert disclosures on September 10, 2024, and
14 supplemented them on November 13, 2024.

15 24. Plaintiff served her fifth supplement to initial disclosures of witnesses and
16 documents on September 10, 2024.

17 25. Defendant served its fourth supplement to initial disclosures of witnesses and
18 documents on September 20, 2024.

19 26. Defendant served its fifth supplement to initial disclosures of witnesses and
20 documents on October 2, 2024.

21 27. Plaintiff served her fourth set of interrogatories on Defendant on October 3,
22 2024.

23 28. Defendant served its initial expert disclosures on October 11, 2024.

24 29. Defendant served its responses to Plaintiff's fourth set of interrogatories on
25 October 29, 2024.

26 30. Defendant served its sixth supplement to initial disclosures of witnesses and
27 documents on October 29, 2024.

28 31. Plaintiff scheduled the deposition of the Person(s) Most Knowledgeable at
TSA on November 20, 2024.

32. Defendant scheduled the deposition of Scott Kley, the custodian of records for Clark County Department of Aviation, on November 29, 2024.

DISCOVERY REMAINING

Defendant has been working diligently to obtain Plaintiff's medical records from her medical providers. However, Plaintiff's medical providers are based out of state and Defendant has received responses of no records from some of them, or is still waiting to receive records from others, including RWJBH University Hospital-Somerset, RWJBH Orthopedic & Spine Institute, New Jersey Healthcare Specialists, PC, Rutgers Health-RWJ Pathology Medical, Delcrest Medical Supplies, LLC, RWJ University Hospital- Wound Care Center, County Podiatry Associates, PA, RWJ Outpatient Center (Somerset/Hamilton) - Columbus PT. Additionally, Defendant will need to request records from Ahmad Haj-Ibrahim, MD at Florence Medical, PC. The requested additional time will allow Defendant the opportunity to obtain the outstanding medical records from Ms. Pop's providers.

The parties reserve the right to engage in any other discovery permitted by applicable rules and within the revised discovery deadlines if the court approves this stipulation.

WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED

Since the entry of the Scheduling Order (ECF No. 28), the parties have been working diligently to advance discovery. Defendant has received some of Plaintiff's medical records from her treating providers which are based out of state, and is working on obtaining the outstanding records.

The extension will allow the parties to address discovery issues and schedule and complete any remaining depositions.

The parties' counsel conferred and agreed that a thirty (30) day extension would be proper. The parties agree that neither party will be prejudiced by the proposed extension, and that they may be prejudiced should the current schedule remain in place. The parties agree the extension is sought in good faith.

1 **EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

2 The following table sets forth the current deadlines and the proposed thirty (30) day
 3 extension of discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Discovery Cutoff	December 10, 2024	January 9, 2025
Dispositive Motions	January 13, 2025	February 12, 2025
Proposed Joint Pretrial Order	February 10, 2025	March 11, 2025¹

9 This request for an extension of time is not sought for any improper purpose
 10 including delay. This is the second request for an extension of discovery deadlines in this
 11 matter.

12 Respectfully submitted this 21st day of November 2024.

13 J. COGBURN LAW

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18 **IT IS SO ORDERED:**

20 
 21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** 11/25/2024

27 ¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be
 28 deferred until 30 days after the Court rules on the dispositive motions.